

<u>SECTION</u>	<u>POLICY NO.</u>	<u>ISSUE DATE</u>	<u>SUPERSEDES</u>
600	601	DECEMBER XX 2020	AUGUST 19, 2019

APPENDIX 1

European Addendum to the Whistleblowing Procedure

This addendum supplements the Business Ethics Policy with respect to the violation reporting provisions set forth in Section 23, “Reporting Violations and the Whistleblowing Procedure,” for directors, officers and employees in the European Union (“European Personnel”) only. In case of a conflict between the Policy and this addendum, this addendum will prevail, subject to applicable law.

Scope and Purpose of the Whistleblowing Procedure

European Personnel may use the Whistleblowing Procedure only to report:

- a. Possible violations of or complaints or concerns about matters relating to Section 2, “Accounting and Financial Reporting” section of the Business Ethics Policy, as well as any other possible violation of or complaints or concerns about matters relating to accounting, internal accounting controls, auditing and bribery;
- b. Any other matters if a vital interest of the Company or when the physical or moral integrity of its Personnel is at risk, including without limitation possible violations of laws or regulations relating to corruption, money laundering, terrorism, environmental, and/or health matters.

Optional Use of the Whistleblowing Procedure

The use of the Whistleblowing Procedure by European Personnel is optional.

Confidentiality and Anonymous Reporting

European Personnel are, in principle, encouraged to report violations on a name basis. The identity of the person making a report under the Whistleblowing Procedure will remain confidential and will not be disclosed to third parties, in particular to the reported person or the reporting parties’ supervisors. The person making the report should, however, be aware that his or her identity may need to be disclosed to the persons in charge of investigating the reported violation or involved in any subsequent judicial proceedings. The making of a report will carry no risk of retribution if the report is made in good faith.

European Personnel may, however, prefer, considering the circumstances, to report a violation on an anonymous basis. Such reports will be processed through the Whistleblowing Procedure as an exception to the principle that European Personnel are encouraged to report violations on a named basis.

Retention of Data

Data concerning European Personnel obtained through reporting made outside the scope and purpose of the Whistleblowing Procedure will be deleted without delay.

Personal data processed under the Whistleblowing Procedure will be deleted within two months of completion of the investigation of the facts alleged in the report. In the event that legal proceedings or disciplinary measures are initiated against the reported person or the person making the report in the case of false or abusive reporting, such period will be

BUSINESS ETHICS POLICY – *Weaving with Integrity*

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extended until the conclusion of these proceedings and the period allowed for any appeal.

Notification

Following the preliminary investigation of the report, European Personnel concerned by the report and/or the investigation will be notified as soon as practicably possible. When, however, protective measures are required, including without limitation to preserve evidence by preventing its destruction or alteration by the reported person, notification to the reported person may be deferred until after such protective measures are implemented.

The reported European Personnel will be informed about (i) the name of the person in charge of investigating the report; (ii) the names of the persons, departments or services within the Company which may receive a copy of the report or information about the investigation; (iii) the facts he or she is accused of; (iv) the reported European Personnel's rights of access to, and of rectification of personal data and how to exercise such rights; and (v) the transfer of his or her personal data out of the EU. The reported person has the right to object to the processing of the personal data for compelling legitimate reasons.

Rights of Access and Rectification

Subject to the foregoing, reported European Personnel can access their registered data in order to check its accuracy and rectify it if they are inaccurate, incomplete or outdated. The exercise of these rights may, however, be restricted in order to ensure the protection of the rights and freedoms of others involved in the Whistleblowing Procedure. The reported person cannot obtain information about the identity of the party making the report, except where the latter knowingly reported false allegations of misconduct.

Reporting Methods

European Personnel may report violations to the following persons:

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| ▪ Chief Executive Officer | A. William Higgins | (603-330-2397) |
| ▪ Chair of the Audit Committee | Kenneth W. Krueger | (518-445-2206) |
| ▪ General Counsel | Joseph M. Gaug | (518-445-2273) |

Additionally, written communication may be mailed to the persons listed above and marked to their attention at the following corporate headquarters address:

Albany International Corp.
216 Airport Drive
Rochester, New Hampshire USA 03867

Any questions regarding this policy or its administration should be directed to the Legal Department.